

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

IN RE:

CROWN ASSETS, LLC,

Debtor.

**SAHIB ARORA, VINEET SINGH,
KING GROUP MGMT LLC, MAHARAJA
INVESTMENTS LLC, and ZILLIONAIRE
ASSETS LLC,**

Movants,

v.

CROWN ASSETS, LLC,

Respondent.

CHAPTER 11

CASE NO. 20-21451-jrs

CONTESTED MATTER

**MOTION AND COMBINED BRIEF FOR ORDER AUTHORIZING
BANKRUPTCY RULE 2004 EXAMINATION OF CROWN ASSETS, LLC**

COME NOW Sahib Arora, Vineet Singh, and King Group MGMT LLC (collectively, the “Arora Parties” or “Movants”) and hereby move this Court for an Order authorizing Movants to conduct an examination of Crown Assets, LLC (“Respondent” or “Examinee”) pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, and in so doing respectfully show the Court the following:

1.

On October 25, 2020, Crown Assets, LLC filed a Voluntary Petition for Relief under Chapter 11 of Title 11 of the United States Code (hereinafter the “Bankruptcy Code”).

2.

Federal Rule of Bankruptcy Procedure 2004 (“Bankruptcy Rule 2004”) provides, in pertinent part, that upon motion of any party in interest, the Court may order the examination of any entity. Bankruptcy Rule 2004 further provides that the examination may relate to “to any matter which may affect the administration of the Debtor’s Estate”. The Advisory Committee’s Note to Bankruptcy Rule 2004 provides, in pertinent part, that the Motion may be heard ex parte or may be heard on notice.

3.

The Examinee, upon information and belief, has information regarding matters necessary for the administration of this estate.

4.

Movants request that the Examinee's Bankruptcy 2004 exam be conducted on December 3, 2020, at 10:00 o'clock a.m. at Jones & Walden LLC, 699 Piedmont Avenue, NE, Atlanta, GA 30308, or upon such date, time and place as may be appropriate.

5.

Movants respectfully request that the Court enter an Order (i) authorizing the examination of Examinee with regard to all matters within the scope of Bankruptcy Rule 2004, and (ii) compelling Examinee to produce all those documents set forth on **Exhibit "A"** which is attached hereto on or by November 30, 2020, at 10:00 a.m. to the office of Jones & Walden LLC located at 699 Piedmont Avenue, NE, Atlanta, GA 30308 or sent by electronic means to Leon S. Jones.

WHEREFORE, Movants pray that this Court enter an Order authorizing the examination of the Examinee pursuant to Federal Rule of Bankruptcy Procedure 2004; and further authorizing the Movants to command the production of documents pursuant to F.R.C.P. 45 and Federal Rule of Bankruptcy Procedure 7026; and that the Movants be granted such other relief as may be just and proper.

Respectfully submitted this 17th day of November, 2020.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

Attorney for Movants

699 Piedmont Avenue, NE, Atlanta, Georgia 30308

(404) 564-9300

ljones@joneswalden.com

THE DOMINY LAW FIRM, LLC

/s/ Michael A. Dominy

Michael A. Dominy

Georgia Bar No. 225335

Attorney for Movants

729 Piedmont Avenue, NE, Atlanta, Georgia 30308

(404) 900-9570

michael@dominylaw.net

EXHIBIT "A"

DEFINITIONS

i. The term "document" in this Examination refers to tangible things which are in the possession, custody, or control of you or others acting on your behalf and means any tangible things from or on which information can be stored, recorded, processed, transmitted, inscribed or memorialized in any way, by any means, regardless of technology or form, including, but not limited to, letters, correspondence, papers, books, accounts, newspaper, magazine and journal articles, photographs, records, objects, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, interviews, conferences, other meetings, occurrences or transactions, writings, drawings, graphs, charts, affidavits, transcripts of depositions or hearings, statements, summaries, opinions, reports, tests, experiments, analyses, evaluations, contracts, agreements, ledgers, journals, books or records of accounts, receipts, summaries of accounts, balance sheets, income statements, financial statements, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound, video or other recordings, computer printouts, computer database, data processing input and output, microfilms, all other records kept by electronic, photographic or mechanical means, and other data compilations from which information can be obtained or translated, if necessary, you through appropriate detection devices into reasonable usable form, and things similar to all the foregoing, however denominated. Each copy of a document which contains any separate notations or writings thereon shall be deemed to be a separate document for purposes of this Examination.

ii. The term "person" in this Examination includes natural persons, corporations, firms, partnerships, proprietorships, associations, LLC's, LLP's, LLLP's, and any and all other organizations and entities.

iii. The term "entity" means any and all corporations, firms, partnerships, proprietorships, associations, LLC's, LLP's, LLLP's, and any and all other organizations and entities.

iv. The term "petition date" refers to the bankruptcy petition date in this case, and the petition date of any other bankruptcy case filed by any Debtor(s) (or affiliate of any Debtor(s)).

v. "Debtor" means Crown Assets, LLC.

vi. The terms "you," "your," and "yours," as used herein, refers to Respondent and any Person acting on Respondent's behalf.

vii. The term "Ahuja" means Karan Ahuja.

viii. The term "Singh" means Charanjeev Singh.

DOCUMENTS TO BE PRODUCED

- (1) Any and all copies of income tax returns, corporate tax returns, sales and use tax returns, and/or intangible tax returns, filed by you, individually or jointly with any other person or entity, filed with the federal, state or municipal governments, for the tax years 2017 to the present.
- (2) Any and all ledgers, balance sheets, profit and loss statements, financial statements, and other financial records relating to Debtor or you covering, in whole or in part, any period from January 2017 to the present.
- (3) Any and all records, documents, memoranda and correspondence relating to any financial statements or net worth statements submitted by Debtor or any entity in which Debtor holds any interest, to any bank, lending institution or any other entity for the period January 2017 to the present.
- (4) Any and all records, documents, memoranda and correspondence relating to any financial statements or net worth statements submitted by you, to any bank, lending institution or any other entity for the period January 2017 to the present.
- (5) Any and all records, documents, memoranda, correspondence, or contracts pertaining to any salary, compensation, or money of any kind paid by Debtor to Ahuja or Singh for the period January 2017 to the present.
- (6) Copies of any and all reports or documents prepared by any expert witness prepared for Debtor or you for use in this Bankruptcy Case.
- (7) Any and all documents you intend to use or may use as evidence at any hearing in this Bankruptcy Case.
- (8) Any and all reports, documents, drafts thereof and correspondences related thereto of any expert witness you may call at any hearing.
- (9) Any and all appraisals, drafts thereof and correspondences related thereto of any real property: (a) owned or managed by Debtor, or (b) owned or managed by any entity in which Debtor owns any interest.
- (10) Any and all documents you intend to use or may use as evidence at hearing on any motion filed by Debtor, without limitation, the motion requesting permission to use cash collateral or matters related thereto.
- (11) Any and all W-2 or 1099 forms issued by or received by Debtor for the period January 2017 to the present.
- (12) Any and all W-2 or 1099 forms issued by or received by Ahuja, individually or jointly with any other person or entity, for the period January 2017 to the present.
- (13) Any and all W-2 or 1099 forms issued by or received by Singh, individually or jointly with any other person or entity, for the period January 2017 to the present.

- (14) Any and all copies of income tax returns, corporate tax returns, sales and use tax returns, and/or intangible tax returns filed with the federal, state or municipal governments, for the tax years 2017 to the present by Debtor or any entity in which Debtor holds any interest, individually or jointly with any other person or entity.
- (15) Any and all copies of income tax returns, corporate tax returns, sales and use tax returns, and/or intangible tax returns filed with the federal, state or municipal governments, for tax years January 2017 to the present: (a) by Ahuja, individually or jointly with any other person or entity, and (b) by any person or entity for which Ahuja served as an officer or was an owner, (c) or from which Ahuja received distributions.
- (16) Any and all copies of income tax returns, corporate tax returns, sales and use tax returns, and/or intangible tax returns filed with the federal, state or municipal governments, for tax years January 2017 to the present: (a) by Singh, individually or jointly with any other person or entity, and (b) any person or entity for which Singh served as an officer or was an owner, or (c) from which Singh received distributions.
- (17) Any and all documents (including operating agreements, bylaws, memoranda, correspondence, stock certificates, bond certificates, mutual fund certificates and any other evidence of ownership of any interest) in any entity naming Ahuja or Singh, individually or jointly with any other person or entity, for the period January 2017 to the present.
- (18) Any and all documents (including operating agreements, bylaws, memoranda, correspondence, stock certificates, bond certificates, mutual fund certificates and any other evidence of ownership of any interest) in any entity naming Debtor or any entity in which Debtor holds any interest, individually or jointly with any other person or entity, for the period January 2017 to the present.
- (19) Copies of any real estate tax bills, notices or assessments received by Debtor or any entity in which Debtor holds any interest for the period January 2017 to the present.
- (20) Any and all copies of income tax returns, corporate tax returns, sales and use tax returns, and/or intangible tax returns, filed with the federal, state or municipal governments, for the tax years 2017 to the present by Debtor or any entity in which Debtor holds any interest, individually or jointly with any other person or entity.
- (21) Any and all bank statements or any account in the name of Debtor or any entity in which Debtor holds any interest covering, in whole or in part, any period from January 2017 to the present.
- (22) Any and all bank statements or any account in the name of you or any entity in which you hold any interest covering, in whole or in part, any period from January 2017 to the present.

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CERTIFICATE OF SERVICE

This is to certify that on this day the foregoing *Motion and Combined Brief for Order Authorizing Bankruptcy Rule 2004 Examination of Crown Assets, LLC* (the "Motion") was electronically filed using the Bankruptcy Court's Electronic Case Filing program which sends a notice of and an accompanying link to the Motion to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

- **Jody Charles Campbell** jody@blumcampbell.com
- **Benjamin Keck** bkeck@rlklawfirm.com, mwinokur@rlklawfirm.com; swenger@rlklawfirm.com; csmith@rlklawfirm.com; bwenger@rlklawfirm.com
- **David S. Klein** dklein@rlklawfirm.com, swenger@rlklawfirm.com; yalamin@rlklawfirm.com; R71213@notify.bestcase.com; csmith@rlklawfirm.com; 1030641420@filings.docketbird.com; bwenger@rlklawfirm.com
- **Office of the United States Trustee** ustpreion21.at.ecf@usdoj.gov
- **William A. Rountree** wrountree@rlklawfirm.com, swenger@rlklawfirm.com; yalamin@rlklawfirm.com; 6717577420@filings.docketbird.com; R71213@notify.bestcase.com; csmith@rlklawfirm.com; ablanc@rlklawfirm.com; bwenger@rlklawfirm.com
- **Todd H. Surden** todd.surden@hartmansimons.com, deloris.person@hartmansimons.com
- **Eric N. Van De Water** eric@isenberg-hewitt.com, evandewater@isenberg-hewitt.com
- **David S. Weidenbaum** david.s.weidenbaum@usdoj.gov

I further certify that on this day I caused a true and correct copy of the Motion to be served on all parties referenced below by depositing a copy in the United States Mail, postage

prepaid, to the following:

Crown Assets, LLC
7530 Saint Marlo Country Club Pkwy
Duluth, GA 30097

This 17th day of November, 2020.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

Attorney for Movants

699 Piedmont Avenue, NE

Atlanta, Georgia 30308

(404) 564-9300

ljones@joneswalden.com